



# South Coast Air Quality Management District

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## **Draft Environmental Impact Report (Draft EIR) for the Proposed Chestnut Street Warehouse Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the lead agency and should be incorporated into the Final CEQA document.

The lead agency proposes construction and operation of approximately 614,597 square feet (sf) of warehouse/office building uses on approximately 28.9 acre site. The proposed project could generate a total of approximately 2,188 daily trips including 447 daily truck trips operating to and from the site. The lead agency estimated that the projects construction impacts were less than significant after mitigation. Additionally, the lead agency determined that the operational air quality impacts would be significant and unavoidable.

The SCAQMD staff has concerns about the assumptions used in the significance threshold modeling and health risk assessment estimates. Since the lead agency has determined that project air quality impacts exceed the SCAQMD recommended daily significance thresholds during operations, the SCAQMD recommends additional mitigation measures in addition to the measures proposed by the lead agency in the Draft EIR. Details are included in the attachment.

Pursuant to Public Resources Code Section 21092.5, SCAQMD staff requests that the lead agency provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the FEIR. Further, staff is available to work with the lead agency to address these issues and any other questions that may arise. Please contact Jack Cheng, Air Quality Specialist CEQA Section, at (909) 396-2448, if you have any questions regarding the enclosed comments.

Sincerely

*Jillian Wong*

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Planning, Rule Development & Area Sources

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LAC160715-03  
Control Number

## ATTACHMENT

### Localized Significance Thresholds and Health Risk Assessment Analyses

- The lead agency did not include emissions from truck routes in their Health Risk Assessment, which underestimates cancer impacts. Truck routes should extend to where the trucks enter the freeway. SCAQMD staff recommends revising the model to include truck routes.

### Mitigation Measures for Operational Air Quality Impacts (Mobile Sources)

- Limit the daily number of trucks allowed at each facility to levels analyzed in the Final EIR. If higher daily truck volumes are anticipated to visit the site, the lead agency should commit to re-evaluating the project through CEQA prior to allowing this higher activity level.
- Require the use of 2010 compliant diesel trucks, or alternatively fueled, delivery trucks. (e.g., food, retail and vendor supply delivery trucks) at commercial/retail sites upon project build-out. If this isn't feasible, consider other measures such as incentives, phase-in schedules for clean trucks, etc.
- Similar to the City of Los Angeles requirements for all new projects, the SCAQMD staff recommends that the lead agency require at least 5% of all vehicle parking spaces (including for trucks) include EV charging stations<sup>1</sup>.

### **Discussion**

Trucks that can operate at least partially on electricity have the ability to substantially reduce the significant NOx impacts from this project. Further, trucks that run at least partially on electricity are projected to become available during the life of the project as discussed in the 2012 Regional Transportation Plan. It is important to make this electrical infrastructure available when the project is built so that it is ready when this technology becomes commercially available. The cost of installing electrical charging equipment onsite is significantly cheaper if completed when the project is built compared to retrofitting an existing building. Therefore, the SCAQMD staff recommends the Lead agency require the proposed warehouse and other plan areas that allow truck parking to be constructed with the appropriate infrastructure to facilitate sufficient electric charging for trucks to plug-in.

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<sup>1</sup> [http://ladbs.org/LADBSWeb/LADBS\\_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf](http://ladbs.org/LADBSWeb/LADBS_Forms/Publications/LAGreenBuildingCodeOrdinance.pdf)